

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ST. PAUL MERCURY INSURANCE
COMPANY

Plaintiff,

v.

PHILADELPHIA HOUSING
AUTHORITY

Defendant.

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Civil Action No. 02-CV-3511

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**PLAINTIFF ST. PAUL MERCURY INSURANCE COMPANY'S
PROPOSED VOIR DIRE**

Plaintiff St. Paul Mercury Insurance Company, by its undersigned attorneys,
submits the following proposed voir dire questions.

1. This case involves a dispute between St. Paul Mercury Insurance Company, which is part of St. Paul Travelers Companies, Inc. and Philadelphia Housing Authority. Is there anyone on the panel who personally has had an employment or business relationship with any of the St. Paul Travelers Companies or who has a member of his or her immediate family who has had an employment or business relationship with the St. Paul Travelers?

a. What was the nature of the relationship?

2. The Defendant in this case is the Philadelphia Housing Authority. Is there anyone on the panel who personally has had a personal or business relationship with the Philadelphia Housing Authority or who has a member of his or her immediate family

who has had an employment or business relationship with the Philadelphia Housing Authority?

a. What was the nature of that relationship?

3. Is there anyone on the panel who is now or ever has been a tenant of housing owned or operated by the Philadelphia Housing Authority?

4. The witnesses in this case are likely to include the following individuals:

- Christine Alexander, an employee of The St. Paul Travelers Companies
- Tony Sienzenko, Iggy Bik and Gabe Caputo, all of whom are employees of NDK General Contractors, Inc.
- Bob Kahan, an employee of Contract Completion, Inc.
- David Stembel, an employee of the architecture firm of Wallace, Roberts and Todd
- Michael J. Leithead, an employee of the Philadelphia Housing Authority
- Sheila Maxwell and Timothy Trzaska, who are former employees of the Philadelphia Housing Authority
- Galo Gutierrez, formerly the president of San Lucas Construction Company, Inc.
- Anthony B. Creamer, III, a CPA who works for Navigant Consulting
- William Manginelli, President of Trauner Consulting Services, Inc.
- Andrew J. Ruck, a lawyer who formerly was a partner at the law firm of Duane, Morris & Heckscher.

Does anyone on the panel know any of these individuals who are likely to be witnesses in this matter?

5. The lawyers for St. Paul are Paul F. Strain and James A. Dunbar of the law firm of Venable LLP. Do any of you, or does any member of your immediately family,

know these lawyers or their law firm or has any of you or any member of your immediate family ever had any business dealings with them or their law firm?

6. The lawyers for the Philadelphia Housing Authority are Nelson Diaz, Alan M. Lieberman and Daniel Rhynhart of the Blank Rome law firm. Do any of you or does any member of your immediate family, know these lawyers or their law firm or has any of you or any member of your immediate family ever had any business dealings with them or their law firm?

7. This law suit involves a dispute with regard to the Richard Allen Homes, which are owned and operated by the Philadelphia Housing Authority. Has any of you heard anything about a dispute between St. Paul and the Philadelphia Housing Authority with respect to the Richard Allen Homes?

a. What have you heard?

8. Two construction companies whose names you may hear frequently during the testimony in this case are San Lucas Construction Company, Inc. and NDK General Contractors, Inc. Has any of you or any member of your immediate family had an employment or business relationship with either of these firms? Has any of you ever heard of either of these firms?

a. What was the nature of the relationship?

b. What have you heard?

9. Has any of you or any member of your immediate family ever been employed in the construction industry, including employment as or by a contractor or builder or employment as a construction inspector?

a. What was the nature of your employment?

b. By whom were you employed?

10. Has any of you or any member of your immediate family had an employment or business relationship with a firm that is in the construction industry or the business of inspecting construction?

a. What was the nature of that relationship?

11. Has any of you or any member of your immediate family worked for the City of Philadelphia?

a. What was the nature of that employment?

12. Has any of you or any member of your immediate family been employed by or had a business relationship with any public housing authority, including the Philadelphia Housing Authority?

a. What was the nature of that relationship?

13. Has any of you or any member of your immediate family ever been employed by the United States Army Corps of Engineers, the United States Department of Housing and Urban Development, or any other federal agency?

a. What was the nature of that employment?

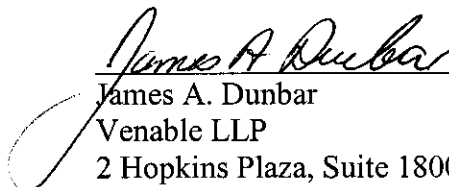
14. Has any of you or any member of your immediate family ever been employed in any job that involved the procurement of products or services by the local, state or federal government?

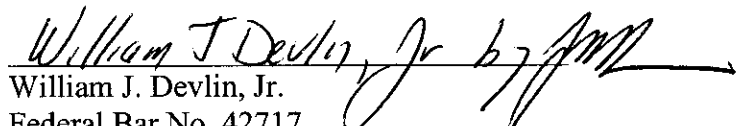
a. What was the nature of that employment?

15. Are any of you, or any members of your immediate family, related to any judge, law clerk, or other court personnel?

a. What is the nature of the relationship?

16. Are any of you, or any members of your immediate family, lawyers?
17. Have any of you, or any members of your immediate family, been employed by lawyers?
18. Have any of you been involved personally, or through a relative or employer, in any lawsuit involving allegations of breach of contract?
 - a. What was the nature of that involvement?
 - b. What was the nature of the lawsuit?
19. Are any of you aware of any reason that you could not render a fair and impartial verdict in this case?
20. Are any of you aware of any health problem or personal issue that might prevent or interrupt your service as jurors during the expected ten-day duration of this trial?


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